

OFFICE OF COUNTY COUNSEL  
COUNTY OF RIVERSIDE

PAMELA J. WALLS  
County Counsel

ANITA C. WILLIS  
Assistant County Counsel

3960 ORANGE STREET, SUITE 500  
RIVERSIDE, CA 92501-3674  
TELEPHONE: 951/955-6300  
FAX: 951/955-6322 & 951/955-6363



February 6, 2013

Raoul Renaud, Hearing Officer  
Christine Stora, Project Manager  
CALIFORNIA ENERGY COMMISSION  
1516 Ninth Street  
Sacramento, CA 95814

California Energy Commission

**DOCKETED**  
**09-AFC-7C**

TN # 69412

FEB. 06 2013

RE: Palen Solar Electric Generating System Amendment (Docket No. 09-AFC-7C)

Dear Hearing Officer Renaud and Ms. Stora:

The County of Riverside ("County") received the Petition to Amend the Energy Commission Decision for the Palen Solar Electric Generating System (Docket No. 09-AFC-7C) ("Petition") submitted by Palen Solar Holdings, LLC. The Petition proposes to eliminate the use of solar parabolic trough technology and replace it with BrightSource Energy, Inc.'s solar power tower technology. County staff is currently reviewing the Petition and the County anticipates providing further comments on the Petition in the coming months. However, we wanted to take a moment to highlight a potential concern regarding the change in technology and its possible interference on the County's Public Safety Enterprise Communication System Project ("PSEC") prior to Commission Staff's filing of an Issues Identification Report. The change from a parabolic trough technology to a heliostats-elevated mirror design with solar power towers represents a significant change in the County's initial review.

The County has invested \$178 million in PSEC, a new regional public safety voice and data communication network. When fully implemented in December of 2013, the PSEC system will provide voice and data communication for law enforcement and other public safety first responders. The PSEC system will deliver enhanced interoperability between public safety agencies through a network of seventy-seven radio sites throughout the County. Since the PSEC sites are secure sites, the County can only provide general locations in a public document.

Riverside County Information Technology ("RCIT") is concerned that the height of the two proposed 750 foot solar power towers may obstruct the PSEC microwave network. Microwave functions on a direct line of sight to the various connection points, and is the backbone of the PSEC network. Microwave provides the link to every site and a path back to the master site. If the proposed solar power towers are positioned between our microwave paths, then they will disrupt mission-critical PSEC communications, including those of law enforcement and other public safety first responders.

After a preliminary review, RCIT does not believe that the two solar power towers proposed in the Petition will block our current microwave paths. If the tower locations change, or after an A1 study for aircraft has been completed, RCIT would like the opportunity to re-run our microwave path profiles using the A1 coordinates to make a final determination on whether or not a line of sight issue exist.

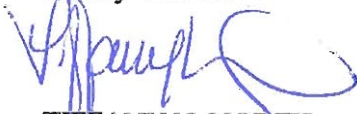
Second, RCIT is concerned about the potential impact the large heliostat fields may have on the PSEC microwave network. Our microwave vendor confirmed our concerns. RCIT is concerned that the proximity of the heliostats to the County's communications tower located on the south side of Interstate

10 at the Corn Springs exit could create reflections into the microwave dish. If this were to occur, our microwave network could be rendered inoperable from the Corn Springs exit. This microwave path supports public safety communications and any potential down time would be devastating to public safety and initial response times for emergencies.

Thank you for taking the County's concerns into consideration as Commission Staff prepares its Issues Identification Report. The County looks forward to working with Commission Staff and Palen Solar Holdings, LLC to resolve this issue. Should you have any questions about the contents of this correspondence, please contact Chuck Rushing, Radio Engineer II, RCIT, at (951) 955-3775 or Tiffany North, Deputy County Counsel at (951) 955-6300.

Sincerely,

PAMELA J. WALLS  
County Counsel



TIFFANY N. NORTH  
Deputy County Counsel



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**AMENDMENT**

**FOR THE PALEN SOLAR ELECTRIC  
GENERATING SYSTEM**

**Docket No. 09-AFC-7C**

**PROOF OF SERVICE  
(EST. 1/30/13)**

**SERVICE LIST:**

**APPLICANT**

Clay Jensen  
Palen Solar Holdings, LLC  
1999 Harrison Street, Suite 2150  
Oakland, CA 94612  
cjensen@brightsourceenergy.com

Ileene Anderson  
Public Lands Desert Director  
Center for Biological Diversity  
PMB 447, 8033 Sunset Boulevard  
Los Angeles, CA 90046  
ianderson@biologicaldiversity.org

**OTHER ENERGY COMMISSION  
PARTICIPANTS (LISTED FOR  
CONVENIENCE ONLY):**

***After docketing, the Docket Unit  
will provide a copy to the persons  
listed below. Do not send copies of  
documents to these persons  
unless specifically directed to do  
so.***

**APPLICANT'S CONSULTANTS**

Andrea Grenier  
Centerline  
1420 E. Roseville Parkway  
Suite 140-377  
Roseville, CA 95661  
andrea@agrenier.com

Basin and Range Watch  
Kevin Emmerich  
Laura Cunningham  
P.O. Box 153  
Baker, CA 92309  
atomicoadranch@netzero.net  
bluerockiguana@hughes.net

KAREN DOUGLAS  
Commissioner and Presiding Member

ROBERT B. WEISENMILLER  
Chair and Associate Member

**APPLICANT'S COUNSEL**

Scott Galati, Esq.  
Marie Mills  
Galati/Blek, LLP  
455 Capitol Mall, Suite 350  
Sacramento, CA 95814  
sgalati@gb-llp.com  
mfleming@gb-llp.com

Alfredo Acosta Figueroa  
Californians for Renewable Energy  
424 North Carlton Avenue  
Blythe, CA 92225  
lacunadeaztlan@aol.com

Raoul Renaud  
Hearing Adviser

Galen Lemei  
Adviser to Presiding Member

**ENERGY COMMISSION –  
PUBLIC ADVISER**

Blake Roberts  
Assistant Public Adviser  
publicadviser@energy.ca.gov

Jennifer Nelson  
Adviser to Presiding Member

Sekita Grant  
Adviser to Associate Member

**INTERESTED AGENCIES**

California ISO  
e-recipient@caiso.com

**COMMISSION DOCKET UNIT**

California Energy Commission  
- Docket Unit  
Attn: Docket No. 09-AFC-07C  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Eileen Allen  
Commissioners' Technical  
Adviser for Facility Siting

Christine Stora  
Project Manager

Jennifer Martin-Gallardo  
Staff Counsel

**INTERVENORS**

Lisa T. Belenky, Senior Attorney  
Center for Biological Diversity  
351 California St., Suite 600  
San Francisco, CA 94104  
lbelenky@biologicaldiversity.org

### **DECLARATION OF SERVICE**

I, Maria Dusek, declare that on February 6, 2013, I served and filed copies of the attached letter from the County of Riverside, dated February 6, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: <http://www.energy.ca.gov/sitingcases/palen/compliance/>.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service) and to the Commission's Docket Unit, as appropriate, in the following manner:

**(Check one)**


**For service to all other parties and filing with the Docket Unit at the Energy Commission:**

  X   I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **OR**

       Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: February 6, 2013

  
Maria Dusek